

FILED

JUN 13 2018

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOHN V. KNOWLES, IV,

Defendant.

No.

4:18CR00505 HEA/NAB

INDICTMENT

COUNT I

The Grand Jury charges that:

At all times pertinent to the charges in this indictment:

1. Federal law defined the term

- (a) "minor" to mean any person under the age of eighteen years (18 U.S.C. § 2256(1));
- (b) "sexually explicit conduct" to mean actual or simulated--
 - (i) sexual intercourse, including genital-genital, anal-genital, oral-genital, oral-anal, whether between persons of the same or opposite sex,
 - (ii) bestiality,
 - (iii) masturbation,
 - (iv) sadistic or masochistic abuse, or
 - (v) lascivious exhibition of the genitals or pubic area of any person (18

U.S.C. §2256(2)(A));

- (c) "computer" to mean an electronic, magnetic, optical, electrochemical or other high speed data processing device performing logical, arithmetic or storage functions, including any data storage facility or communications facility directly related to or operating in conjunction with such device.

(18 U.S.C. §2256(6));

- (d) "child pornography" to mean any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where--

- (A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; or

- (C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct. (18

U.S.C. §2256(8)).

2. The "Internet" was, and is, a computer communications network using interstate and foreign lines to transmit data streams, including data streams used to store, transfer and receive graphic files.
3. Between on or about January 1, 2014, and November 9, 2016, within the Eastern District of Missouri and elsewhere,

John V. Knowles, IV,

the defendant herein, did knowingly receive videos and images of child pornography over the internet, a means or facility of interstate commerce, and these videos and images were visual depictions that involved the use of a minor engaging in sexually explicit conduct and such visual

depictions were of a minor engaging in sexually explicit conduct, including but not limited to the following:

1. "0197_1374168597863.jpg" – a graphic image file depicting a prepubescent minor male child in a lascivious display of his genitals;
2. "aasdfasdfwef.jpg" – a graphic image file depicting a finger penetrating the genitals of a prepubescent minor female child;
3. "(29).AVI" – a graphic video file depicting of two prepubescent minor male children performing sex acts on each other;
4. "Yvm - Daphne #4 special .avi" – a graphic video file depicting a prepubescent minor female child in a lascivious display of her genitals.

In violation of Title 18, United States Code, Section 2252A(a)(2).

COUNT II

The Grand Jury further charges that:

1. The allegations contained in paragraphs one, two, and three of Count I of this Indictment are incorporated by reference as if fully set forth herein.
2. Between on or about January 1, 2016, and November 9, 2016, in the Eastern District of Missouri, and elsewhere,

John V. Knowles, IV,

the defendant herein, did knowingly possess material that contains images and videos of child pornography that was produced using materials that traveled in interstate and foreign commerce, to wit, a Seagate hard drive, that was produced outside of Missouri and therefore has traveled in interstate and foreign commerce, and said hard drive contained child pornography, including but not limited to the following:

1. "1386075128803.jpg" – a graphic image file depicting a minor prepubescent female in a lascivious display of her genitals;
2. "8yo girl pee (nice spray).avi" – a graphic video file depicting a minor prepubescent female in a lascivious display of her genitals;
3. "PTHC 2012-vibro_school.avi" – graphic video file depicting a minor prepubescent female and a minor prepubescent male in a lascivious display of their genitals and engaged in sex acts.

In violation of Title 18, United States Code, Section 2252A(a)(5)(B).

COUNT III

The Grand Jury further charges that:

1. The allegations contained in paragraphs one, two, and three of Count I of this Indictment are incorporated by reference as if fully set forth herein.
2. Between on or about January 1, 2017, and August 2, 2017, in the Eastern District of Missouri, and elsewhere,

John V. Knowles, IV,

the defendant herein, did knowingly receive videos and images of child pornography over the internet, a means or facility of interstate commerce, and these videos and images were visual depictions that involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of a minor engaging in sexually explicit conduct, including but not limited to the following:

1. "\$RL1JIE6.mp4" – a graphic video file depicting lascivious display of prepubescent minor female's genitals;

2. "\$RLK1RRJ.mp4" – a graphic video file depicting a prepubescent minor female in a lascivious display of her genitals;
3. "\$R722W0O.mp4" – a graphic video file depicting a prepubescent minor female's genitals being penetrated.

In violation of Title 18, United States Code, Section 2252A(a)(2).

COUNT IV

The Grand Jury further charges that:

1. The allegations contained in paragraphs one, two, and three of Count I of this Indictment are incorporated by reference as if fully set forth herein.

2. Between on or about January 1, 2017, and August 2, 2017, in the Eastern District of Missouri, and elsewhere,

John V. Knowles, IV,

the defendant herein, did knowingly possess material that contains images and videos of child pornography that was produced using materials that traveled in interstate and foreign commerce, to wit, a "Geek Squad" Thumb Drive, that was produced outside of Missouri and therefore has traveled in interstate and foreign commerce, and said thumb drive contained child pornography, including but not limited to the following:

1. "22837338xfg.jpg" – a graphic image file of a minor prepubescent female in a lascivious display of her genitals;
2. "22837340DUD.jpg" – a graphic image file of a minor prepubescent female in a lascivious display of her genitals;
3. "22839507Tdp.jpg" – a graphic image file of minor prepubescent female in a lascivious display of her genitals.

In violation of Title 18, United States Code, Section 2252A(a)(5)(B).

A TRUE BILL.

FOREPERSON

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